

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL NO. 04-30007-MAP
)
Ann Marie Czaplicki)
Defendant.)
)

THE GOVERNMENT'S MOTION FOR AN ORDER OF EXCLUDABLE DELAY
(Assented to)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves for an order of excludable delay under the Speedy Trial Act, 18 U.S.C. §3161(h)(8). In support of this motion the government states that on or about September 9, 2004, counsel for the defendant and undersigned counsel for the government discussed resolving this case through a plea. While the resolution of the case through a guilty plea is likely, the parties need additional time. The defendant has assented to the government's request through his counsel, Attorney Judith Knight.

It is in the best interests of the defendant, the government, and the public to allow a delay in order for the plea negotiations to continue, and to exclude the time from September 9, 2004 until October 22, 2004, from the period within which the trial of this case must commence under the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: s/s Paul Hart Smyth

Paul Hart Smyth
Assistant U.S. Attorney

Dated: September 9, 2004